

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

FIRST-CLASS PACKAGE SERVICE (FCPS)  
SERVICE STANDARD CHANGES, 2021

Docket No. N2021-2

**MOTION OF THE UNITED STATES POSTAL SERVICE TO ADMIT INTO EVIDENCE  
THE DIRECT TESTIMONIES AND ASSOCIATED LIBRARY REFERENCES OF  
POSTAL SERVICE WITNESSES HAGENSTEIN, KIM, AND FOTI**  
(August 11, 2021)

Pursuant to Presiding Officer's Ruling No. N2021-2/6 (August 6, 2021), the United States Postal Service hereby respectfully moves to admit into evidence in the record of this docket the written direct testimonies of Postal Service witnesses Hagenstein (USPS-T-1), Kim (USPS-T-2), and Foti (USPS-T-3), as well as the library references that they sponsored associated with their respective direct testimonies (public USPS-LR-N2021-2-1 through -4, and nonpublic USPS-LR-N2021-2-NP1 through -NP3).

In POR No. 6, the Presiding Officer excused Postal Service witnesses Hagenstein, Kim, Foti, and Owens (as well as APWU witness Morrison) from appearing, and thus cancelled hearings.<sup>1</sup> On August 10, pursuant to POR No. 6, the Postal Service filed notices of the designated materials for each of its witnesses, as well as declarations executed by each of them. In their declarations, witnesses Hagenstein,

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<sup>1</sup> Sharon Owens is the institutional witness of the United States Postal Service in this case, and she introduced no written direct testimony.

Kim, and Foti attested that their respective written direct testimonies had been prepared by them or under their direction, and that their oral testimonies would be the same. Authenticated copies of their direct testimonies, as corrected by these witnesses, accompanied the declarations. In the declarations, the witnesses also attested that they sponsored the library references associated with their respective direct testimonies, which were listed therein.

Therefore, in accordance with POR No. 6, the Postal Service respectfully moves for the admission into evidence in the record in this docket the written direct testimonies of witnesses Hagenstein, Kim, and Foti, as well as the library references associated with their direct testimonies.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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